

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION OF AUSTIN**

PIERRE BRAZEAU, Individually and on
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

CLASS ACTION

**NOTICE OF NON-OPPOSITION BY
STEVE BURMEISTER**

WANDA NEWELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN, and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00856-RP

MANOHAR K. RAO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00971-RP

On October 26, 2021, Steve Burmeister filed a motion pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b) and 78t(a), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, to: (i) consolidate the related actions; (ii) appoint him as lead plaintiff; and (iii) approve his selection of counsel. *See* ECF No. 33.

The PSLRA establishes a presumption that the “most adequate plaintiff” is the movant who: (i) possesses the “largest financial interest in the relief sought by the class”; and (ii) otherwise satisfies the adequacy and typicality requirements of FED. R. CIV. P. 23 (“Rule 23”). *See* 15 U.S.C. § 78u-4(a)(3)(B)(iii). Here, Mohammad Bozorgi possesses the “largest financial interest in the relief sought by the class” pursuant to the PSLRA. *See* ECF No. 26-4. Mr. Bozorgi also appears to satisfy Rule 23’s adequacy and typicality requirements. Accordingly, Mr. Burmeister supports Mr. Bozorgi’s motion for appointment as lead plaintiff and approval of his selection of lead counsel.

Mr. Burmeister remains willing and able to serve as a representative party in this matter and his notice of non-opposition is submitted without prejudice to Mr. Burmeister’s right to participate in this litigation or share in any recovery from the resolution of this litigation through settlement, judgment, or otherwise.

Respectfully submitted,

Dated: November 3, 2021

By: /s/ Matthew R. McCarley

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Proposed Lead Counsel for the Putative
Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ Matthew R. McCarley

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